

## REMARKS/ARGUMENTS

The Examiner is thanked for the performance of a thorough search. By this amendment, Claims 1, 18, and 23 have been amended. No claims have been added or canceled. Hence, Claims 1, 3–18, 20–23, and 25–42 are pending in this application.

All issues raised in the Office Action are addressed hereinafter.

### I. CLAIM REJECTIONS BASED ON 35 U.S.C. § 101

Claims 18, 20–23, 25–39, and 41–42 were rejected under 35 U.S.C. § 101 as allegedly directed to non-statutory subject matter. Specifically, the Office Action alleged that the Claims are directed towards “software per se.” The rejection is respectfully traversed.

35 U.S.C. § 101 “defines four categories of inventions that Congress deemed to be the appropriate subject matter of a patent: processes, machines, manufactures and compositions of matter.” MPEP 2106.IV.A. Claims 18, 20–23, 25–39, and 41–42, reciting “apparatuses,” are clearly directed towards machines, and for that reason alone recite statutory subject matter. To allege that they are directed towards “software per se” ignores the plain and ordinary meaning of the word “apparatus.”

Nonetheless, the Office Action alleges that the apparatuses of these claims is “software per se” because the apparatuses comprise “means for” performing various functions, wherein the means for is alleged to comprise “only computer software.” The Office Action incorrectly interprets the Specification. When the specification describes “adding additional software package to generate such mappings” to the apparatus depicted in FIG. 15, the Specification does not imply that the apparatus is “only computer software.” Rather, one skilled in the art would understand that **hardware components of the apparatus** may utilize “an additional software package” to **fulfill the function of “generating such mappings.”**

In fact, nowhere does the Specification indicate that the various functions performed by the apparatuses of the Claims could be performed by software alone. Computer software, alone, is incapable of performing any function. For example, software, by itself, cannot read from a database. Rather, to be useful in performing any real world action, software must be executed within a machine—for example, by one or more processors in a computer. Since the

Claims are directed to components and means for performing real world actions, such as “reading from a database,” the Office Action errors in interpreting the Claims as being directed towards software alone, which is incapable of real world action. Thus, to the extent that the various “means for” recited in the Claims implicate software, the Claims must be interpreted as being directed towards a machine executing software, as opposed to software itself.

Furthermore, Applicants’ specification, at ¶ [0013], indicates that the various “means” recited in the claims “may be implemented using various types of operating systems, computing platforms, computer programs, and/or **general purpose machines**.” Thus the specification explicitly recites a non-software means for performing the various functions of the Claims.

For at least the reasons explained above, Claims 18, 20–23, 25–39, and 41–42 are directed towards statutory subject matter under 35 U.S.C. § 101. Reconsideration of the rejection is requested.

## II. CLAIM REJECTIONS BASED ON 35 U.S.C. § 103

### A. *Obviousness under 35 U.S.C. § 103(a): Davis and Davis.*

Claims 1, 3–18, 20–23, and 25–42 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Pub. No. 2003/0041077 by Davis et al. (hereinafter “*Davis*”) in view of U.S. Patent No. 6,920,608 to Davis et al. (hereinafter “*Davis* ‘608”). Applicants traverse the rejection. Reconsideration is respectfully requested.

### INDEPENDENT CLAIM 1

Claim 1, as set forth in the listing of claims, clarifies that the method features:

reading, from a database, said internal metadata;  
     wherein said internal metadata is metadata that describes data, contained  
         in the database;  
 generating and displaying a screen, wherein displaying the screen includes  
     displaying the internal metadata, which was read from the database, in a  
     grid having rows and columns, wherein dimensional metadata from said  
     internal metadata is placed in the grid as row headings and/or column  
     headings;

receiving from a user a selection of a portion of said grid, said selection indicating one or more cells of the grid;  
**in response to receiving from the user said selection:**  
determining which internal metadata, displayed on said grid, corresponds to said one or more cells;  
wherein the internal metadata that corresponds to the one or more cells is a subset of all internal metadata displayed in said grid; and  
**presenting to the user one or more user interface controls for receiving, from said user, a definition of external metadata;**  
wherein the definition of external metadata is for only said subset of internal metadata that corresponds to cells that were selected by said selection;  
**wherein the definition of external metadata specifies particular external metadata to associate with said subset of internal metadata;**  
wherein the definition of external metadata describes all data points within said selection;  
**receiving, via the one or more user interface controls, said definition of external metadata;** and  
creating a mapping between said selected internal metadata and the particular external metadata.

At least the above-bolded limitations are not shown or suggested in the cited references.

*Davis* teaches that XBRL text documents may be parsed and translated into RDX documents or NDOMs. *Davis* at ¶ [0062]. The RDX documents and NDOMs may then, by means of an RDX mapper 210, be translated back into XBRL for reporting purposes. *Davis* at FIG. 2, ¶ [0065]. The RDX mapper 210 utilizes document templates 214 for mapping instructions. *Davis* at ¶ [0064]. These document templates 214 are created manually by a user “in a manner similar to a word processor.” *Davis* at ¶ [0063]. Thus, while *Davis* teaches that data may be mapped from one format into another format, *Davis* teaches nothing like Claim 1’s method for assisting a user in creating a mapping.

By further contrast, *Davis* ‘068, to the extent that it is relied upon in the Office Action, teaches that internal data may be visualized in “a spreadsheet view and a graphical user interface.” *Davis* ‘068 also teaches that RDML documents must conform to the RDML type DTD.

In combination, the two references teach that (1) a user may manually create a document template to map RDX documents and NDOM documents to XBRL; (2) internal data may be depicted visually in spreadsheets and graphical user interfaces; and (3) RDML documents

conform to a DTD. Thus, the combination of *Davis* and *Davis* '068 fails to teach or suggest a number of features of Claim 1.

(1) The references do not disclose “a definition of external metadata”

For example, neither *Davis* nor *Davis* '068 teaches or suggests “a definition of external metadata” within the meaning of Claim 1. Claim 1 specifically requires that “the definition of external metadata specifies particular external metadata to associate with said subset of internal metadata.” Using this “definition of external metadata,” a computer implementing the method of Claim 1 can “creat[e] a mapping between . . . internal metadata and the particular external metadata.”

The Office Action alleges that *Davis* '068 discloses a “definition of external metadata” by virtue of the existence of a document type definition (DTD) for the RDML document 102. Applicants readily admit that a DTD may be used to define a document format; however a DTD is not “a definition of external metadata” within the sense of Claim 1. That is to say, a DTD does not “specif[y] particular external metadata to associate with said subset of internal metadata.” In fact, one skilled in the art would recognize that a DTD is concerned only with defining a document format, and offers no indication regarding whether to associate metadata from one source with metadata in another source. Thus, a DTD would be of no assistance in “creating a mapping between . . . internal metadata and . . . external metadata.”

Nor does *Davis* disclose a “definition of external metadata.” While *Davis* discloses documents template that assist in creating a mapping, these document templates are not, as required by Claim 1, “for only [a] subset of internal metadata that corresponds to cells that were selected.” Rather, a document template is created and edited within a word processing-like interface, in which there is no “subset of internal metadata” or “selection” of cells in a grid, as required by Claim 1.

(2) The reference do not disclose “presenting to the user one or more user interface controls for receiving, from said user, a definition of external metadata.”

Also, neither *Davis* nor *Davis* '068 teaches or suggests the step of “in response to [a] selection [of cells in a grid] . . . presenting to the user one or more user interface controls for receiving, from said user, a definition of external metadata.”

The Office Action alleges that this step is made obvious because *Davis* teaches “presenting to the user one or more user interface controls” and *Davis* ‘068 teaches “receiving, from said user, a definition of external metadata.” The Office Action is in error for at least the reason that, as discussed above, *Davis* ‘068 does not teach “a definition of external metadata.”

Furthermore, the Office Action fails to allege any motivation for modifying *Davis*’ “one or more user interface controls” to receive the DTD of *Davis* ‘068. The DTD against which the RDML documents of *Davis* ‘068 are to be validated is well known and publicly accessible over the Internet. It would be pointless to provide any interface for a user to submit it. More likely, a computer program designed to implement *Davis* ‘068 would itself already include the DTD. Thus, there would be no motivation to combine *Davis*’ “one or more user interface controls” to receive the DTD of *Davis* ‘068.

Finally, Claim 1 presently recites that this step of presenting user interface controls occurs “**in response to**” the user selecting cells within a grid displaying internal metadata. Neither *Davis* nor *Davis* ‘068 suggests performing any action in response to the user selecting cells within a grid displaying internal metadata, much less “presenting to the user one or more user interface controls for receiving, from said user, a definition of external metadata.”

(3) *The references do not disclose that “receiving . . . the definition of external metadata” occurs “via . . . user interface controls” displayed “in response” to receiving a selection in a grid.*

As another example, neither *Davis* nor *Davis* ‘068 teaches or suggests that “receiving . . . the definition of external metadata” occurs “via . . . user interface controls” displayed “in response” to receiving a selection in a grid.

The Office Action alleges that the step of “receiving . . . the definition of external metadata” is taught in *Davis* at ¶¶ [89–90]. These paragraphs of *Davis* discuss supplementing DTD validation with validation based on user-defined rules. The Office Action appears to allege that a user defining these rules fulfills the step of “receiving . . . the definition of external metadata.” The Office Action is mistaken.

As a preliminary matter, the Office Action elsewhere insists that a DTD is “the definition of external metadata,” not user-defined rules. Thus the Office Action is inconsistent in its allegations that the cited references teach a “definition of external metadata.”

Even ignoring that inconsistency, however, it is clear that *Davis* at ¶¶ [89–90] is concerned solely with document validation. The user-defined rules of ¶¶ [89–90] are used to validate and interpret the data in a document. However, like a DTD, one skilled in the art would understand that *Davis*’ user-defined rules are useless for mapping metadata to another format. This understanding is evidenced in the fact that, while *Davis* mentions that the RDX parser 204 applies “the user-defined rules” to interpret the XBRL document, *Davis* does not implicate the user-defined rules in the process of building the NDOM. *Davis* at ¶¶ [90–91]. Therefore, receiving the user-defined rules does not teach receiving the definition of external metadata.

Furthermore, Claim 1 recites that the “definition of external metadata” is received via “the one or more user interface controls.” Significantly, “the one or more user interface controls” are the same controls as those presented “in response to receiving from the user said selection” of cells within a grid displaying internal metadata. While *Davis*’ user-defined rules are undoubtedly received via a user interface control, *Davis* is silent as to when the rules are received or as to the nature of a control capable of submitting them. Indeed, there is no suggestion in the combination of *Davis* and *Davis* ‘068 that such a control would be displayed **in response** to a user selecting cells within a grid displaying internal metadata.

For at least the foregoing reason, the combination of *Davis* and *Davis* ‘068 fails to teach or suggest at least one feature of independent Claim 1. Therefore, the combination of *Davis* and *Davis* ‘068 does not render Claim 1 obvious under 35 U.S.C. § 103. Reconsideration is respectfully requested.

### INDEPENDENT CLAIMS 18 AND 23

Independent Claims 18 and 23 also recite features argued above with relation to Claim 1, although Claims 18 and 23 is expressed in another format. Because Claims 18 and 23 have at least one of the features described above for Claim 1, Claims 18 and 23 are therefore allowable over the combination of *Davis* and *Davis* ‘068 for at least one of the same reasons as given above for Claim 1. Reconsideration is respectfully requested.

**DEPENDENT CLAIMS 1, 3-18, 20-23, AND 25-42**

Each of Claims 1, 3-18, 20-23, and 25-42 depend from Claims 1, 18, or 23, and includes the above-quoted features of its parent claim by dependency. Thus, the combination of *Davis* and *Davis* '068 also fails to teach or suggest at least one feature found in Claims 1, 3-18, 20-23, and 25-42. Therefore, the combination of *Davis* and *Davis* '068 does not render obvious Claims 1, 3-18, 20-23, and 25-42. Reconsideration of the rejection is respectfully requested.

In addition, each of Claims 1, 3-18, 20-23, and 25-42 recite at least one feature that independently renders it patentable. However, to expedite prosecution in light of the fundamental differences already identified, further arguments for each independently patentable feature of Claims 1, 3-18, 20-23, and 25-42 are not provided at this time. Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

**III. ADDED CLAIMS / AMENDMENTS**

The added claims and amendments to the claims do not add any new matter to this application. The amendments to Claims 1, 18, and 23 are supported by at least ¶ [0021] of the Specification and Applicants' original claims. The amendments to the claims were made to improve the readability and clarity of the claims and not necessarily for any reason related to patentability.

**IV. CONCLUSION**

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a check for the petition for extension of time fee and other applicable fees is enclosed herewith. If any applicable fee is missing or insufficient, throughout

the pendency of this application, the Commissioner is hereby authorized to any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,  
HICKMAN PALERMO TRUONG & BECKER LLP

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/KarlTRees#58983/

Karl T. Rees, Reg. No. 58,983

2055 Gateway Place, Suite 550  
San Jose, CA 95110  
(408) 414-1233  
Facsimile: (408) 414-1076